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10 Attorneys for Jaime Vigil-Castro

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

vs.

15 JAIME VIGIL-CASTRO,
16 aka Juan Perez-Acosta,

17 Defendant.

18 2:13-cr-195-APG-GWF
19 2:13-cr-403-KJD-GWF

**STIPULATION TO JOIN CASES FOR
SENTENCING**

20 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United
21 States Attorney, and Robert Bork Assistant United States Attorney, counsel for the United States of
22 America, and Rene L. Valladares, Federal Public Defender, and Heidi A. Ojeda, Assistant Federal
23 Public Defender, counsel for JAIME VIGIL-CASTRO, who hereby stipulate to this Honorable Court
24 for an order joining the above cases for purposes of plea and sentencing.

25 This Stipulation is entered into for the following reasons:

26 1. On May 29, 2013, Defendant was indicted for a violation of 8 U.S.C. § 1326 in case
27 styled 2:13-cr-195-APG-GWF. (CR 1.) Mr. Vigil-Castro entered into a plea agreement with the
Government and entered a plea of guilty to the single-count Indictment on July 31, 2013. Sentencing
in this matter is currently set for February 5, 2014.

28 2. On December 4, 2013, the Defendant Jaime Vigil-Castro made his initial appearance
before the Court on a Petition for Warrant for Offender Under Supervision in the case styled 2:13-cr-
403-KJD-GWF. (CR 6.) Jurisdiction of the Petition for Warrant for Offender Under Supervised
Release was originally in Texas. Jurisdiction was transferred from Texas on November 14, 2013.

1 (CR4.) The revocation hearing in this matter is currently scheduled for December 17, 2013 before
2 Judge Dawson.

3 3. Counsel requests the court vacate the currently scheduled revocation hearing in case
4 2:13-cr-403-KJD-GWF, consolidate these cases and be reassigned before the Honorable Judge
5 Andrew P. Gordon for purposes of sentencing.

6 4. Defendant will admit the facts to the underlying petition for revocation.

7 5. Counsel agree to join these two cases for the purposes of sentencing.

8 6. In light of the foregoing, it would be in the interest of judicial economy to join these
9 cases before one single Judge for sentencing. The defendant respectfully requests that this court enter
10 an Order joining the above cases for the purposes of sentencing.

11 7. Any additional delay in time by granting this Stipulation is excusable in computing
12 the time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,
13 United States Code, Section 3161(h)(1)(D) and Title 18, United States Code, Section 3161(h)(7)(A),
14 considering the factors under Title 18, United States Code, Sections 3161(h)(7)(B)(i) and
15 3161(h)(7)(B)(iv).

16 DATED this 10th day of December, 2013.

17 RENE L. VALLADARES
18 Federal Public Defender

DANIEL G. BOGDEN
United States Attorney

19 /s/ Heidi A. Ojeda
20 By _____
21 HEIDI A. OJEDA
Assistant Federal Public Defender
Counsel for Defendant

/s/ Robert Bork
By _____
ROBERT BORK
Assistant United States Attorney
Counsel for Plaintiff

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3 ***

4 UNITED STATES OF AMERICA,

5 Plaintiff,

6 vs.

7 JAIME VIGIL-CASTRO,
aka Juan Perez-Acosta,

8 Defendant,

2:13-cr-195-APG-GWF
2:13-cr-403-KJD-GWF

9
10 **ORDER**

11 Based upon the foregoing stipulation and good cause appearing therefore,

12 IT IS HEREBY ORDERED that the above cases are joined for the purposes of sentencing,
and shall hereafter be assigned the case number of 2:13-cr-195-APG-GWF.

13 DATED December 11, 2013.

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15 UNITED STATES DISTRICT JUDGE

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